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Counsel for *Amicus Curiae* Backcountry
Hunters & Anglers

UNITED STATES DISTRICT COURT
DISTRICT OF WYOMING

IRON BAR HOLDINGS, LLC, a North
Carolina limited liability company registered
to do business in Wyoming,

Case No. 22-CV-00067-SW

Plaintiff,

v.

BRADLY H. CAPE, an individual,
ZACHARY M. SMITH, an individual,
PHILLIP G. YEOMANS, an individual, and
JOHN W. SLOWENSKY, an individual,

Defendants.

**[PROPOSED] DECLARATION OF ERIC B. HANSON IN SUPPORT OF BRIEF OF
AMICUS CURIAE BACKCOUNTRY HUNTERS & ANGLERS**

I, Eric B. Hanson, hereby declare as follows:

1. I am an attorney at Keker, Van Nest & Peters LLP, counsel for *Amicus Curiae* Backcountry Hunters & Anglers (“BHA”) in the above-captioned matter. I have personal knowledge of the facts contained herein, and if called as a witness, I could and would testify competently thereto.

2. Attached as Exhibit 1 is a true and correct copy of “The Corner-Locked Report” by OnX Maps, available at <https://www.onxmaps.com/onx-access-initiatives/corner-crossing-report>, last accessed October 28, 2022.

3. Attached as Exhibit 2 is a true and correct copy of a listing for the Laramie Plains Ranch from the website LandWatch.com, available at <https://www.landwatch.com/albany-county-wyoming-farms-and-ranches-for-sale/pid/414833854>, last accessed October 20, 2022.

4. Attached as Exhibit 3 is a true and correct copy of a listing for the Kite Ranch from the website LandWatch.com, available at <https://www.landwatch.com/albany-county-wyoming-farms-and-ranches-for-sale/pid/410167037>, last accessed October 27, 2022.

5. Attached as Exhibit 4 is a true and correct copy of a listing for the Lost In Time Cedar Breaks Ranch from the website LandWatch.com, available at <https://www.landwatch.com/wibaux-county-montana-farms-and-ranches-for-sale/pid/414569840>, last accessed October 28, 2022.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on November 29, 2022 at Los Angeles, California.

/s/ Eric B. Hanson
Eric B. Hanson

EXHIBIT 1

EXHIBIT 2

Enter a City, County, State, or ID

● Available
\$18,600,000
 Fetterman Road, Rock River, WY 82083
 (Albany County)

Size: 54,209 Acres
Type: Farms and Ranches, Recreational Property, House

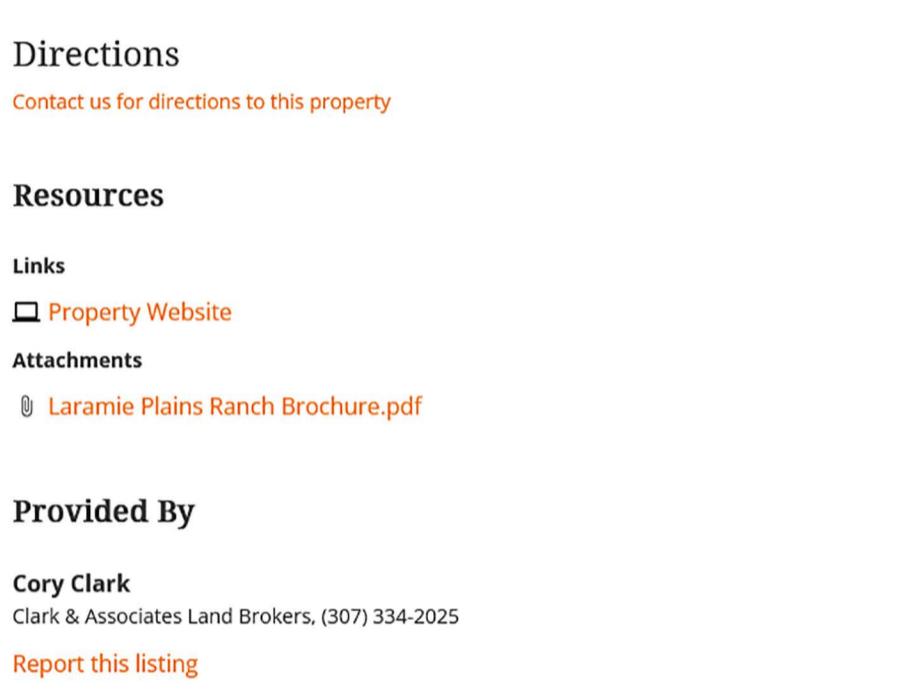


Laramie Plains Ranch

Located in Albany County, Wyoming, approximately 45 miles north of Laramie, or 55 miles west of Wheatland, Wyoming, the Laramie Plains Ranch features 54,209 total contiguous acres and consists of 25,764 deeded acres, 5,338 State of Wyoming lease acres, 8,251 BLM lease acres and 14,856 private lease acres fenced into the ranch. Water is abundant on the ranch. Rock Creek traverses the property for approximately seven miles and the ranch surrounds Wheatland Reservoirs #2 and #3. Senior water rights provide water to irrigate hay ground. The hardy grass of the Laramie Plains provides excellent grazing for yearlings with the Laramie Plains Ranch owner-rated at 4,200 head of yearling cattle during the summer months. Multiple improvements on the ranch provide housing and cattle working facilities. Wildlife is abundant on the property with deer, antelope, elk and upland game birds known to frequent the ranch.

[Read Less](#)

Map



Directions

[Contact us for directions to this property](#)

Resources

Links

Attachments

Provided By

Cory Clark

Clark & Associates Land Brokers, (307) 334-2025

[Report this listing](#)

More by Cory Clark



50 Acres • \$1,600,000

4 beds • 5 baths

Sterling, CO, 80751, Logan County

Scott Leach

Clark & Associates La...



21,730 Acres • \$10,000,000

Oelrichs, SD, 57763, Fall River County

Mark McNamee

Clark & Associates La...



273 Acres • \$2,500,000

Buffalo, WY, 82834, Johnson County

Clark & Associ...



54,209 Acres • \$18,600,000

Rock River, WY, 82083, Albany County

Clark & Associ...

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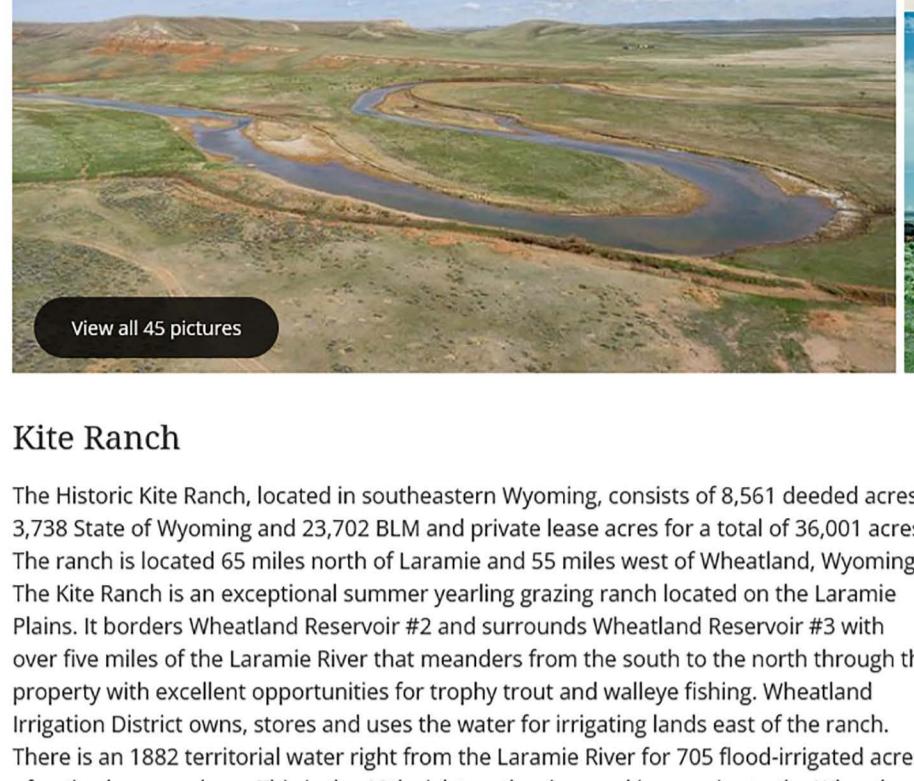
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EXHIBIT 3

Enter a City, County, State, or ID

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Kite Ranch

The Historic Kite Ranch, located in southeastern Wyoming, consists of 8,561 deeded acres, 3,738 State of Wyoming and 23,702 BLM and private lease acres for a total of 36,001 acres. The ranch is located 65 miles north of Laramie and 55 miles west of Wheatland, Wyoming. The Kite Ranch is an exceptional summer yearling grazing ranch located on the Laramie Plains. It borders Wheatland Reservoir #2 and surrounds Wheatland Reservoir #3 with over five miles of the Laramie River that meanders from the south to the north through the property with excellent opportunities for trophy trout and walleye fishing. Wheatland Irrigation District owns, stores and uses the water for irrigating lands east of the ranch. There is an 1882 territorial water right from the Laramie River for 705 flood-irrigated acres of native hay meadows. This is the 12th right on the river and is superior to the Wheatland Irrigation District's rights. The ranch is watered via the Laramie River and seven miles of shoreline on Wheatland Reservoir #3. There are seven solar wells with tire tanks, other ponds and an underground pipeline from the corrals to the horse pasture. The terrain of the ranch is high mountain plains and consists of high protein, short grass that produces 2-2.5 lbs. of gain per day on yearling cattle. The ranch is conservatively owner-rated for 2,000+ yearlings for 4-5 months. With the use of the lands owned by others, but fenced into the ranch, and with the productive grasses created by the receding water levels on the two reservoirs in some years, carrying capacity could be up to 3,000+ yearlings. The cattle-handling facilities are in good working condition and can handle large numbers of cattle. The facilities include pipe and steel corrals, sorting alleys, scale, covered processing area with a hydraulic squeeze chute and steel wind breaks. The Kite Ranch house was built in 1901 and features 14 rooms with two stories. The stone house is a landmark of Wyoming ranching history and shows the foresight of pioneers that settled these productive grazing lands. The Kite Ranch offers waterfowl, antelope, mule deer hunting along with trout and walleye fishing.

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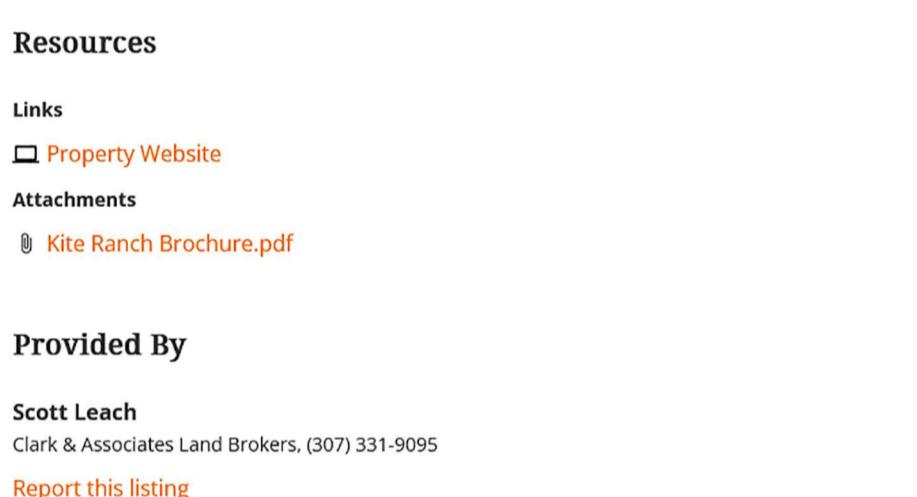
Amenities

Land

Present Use

- Agribusiness

Map



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Directions

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Resources

Links

[Property Website](#)

Attachments

[Kite Ranch Brochure.pdf](#)

Provided By

Scott Leach

Clark & Associates Land Brokers, (307) 331-9095

[Report this listing](#)

More by Scott Leach



50 Acres • \$1,600,000

4 beds • 5 baths

Sterling, CO, 80751, Logan County

Scott Leach
Clark & Associates Land ...

[Contact](#)



380 Acres • \$950,000

Wheatland, WY, 82201, Platte County

Scott Leach
Clark & Associates Land ...

[Contact](#)



80 Acres • \$198,000

Guernsey, WY, 82214, Platte County

Scott Leach
Clark & Associates Land ...

[Contact](#)



36,001 Acres • \$9,100,000

Wheatland, WY, 82201, Albany County

Scott Leach
Clark & Associates Land ...

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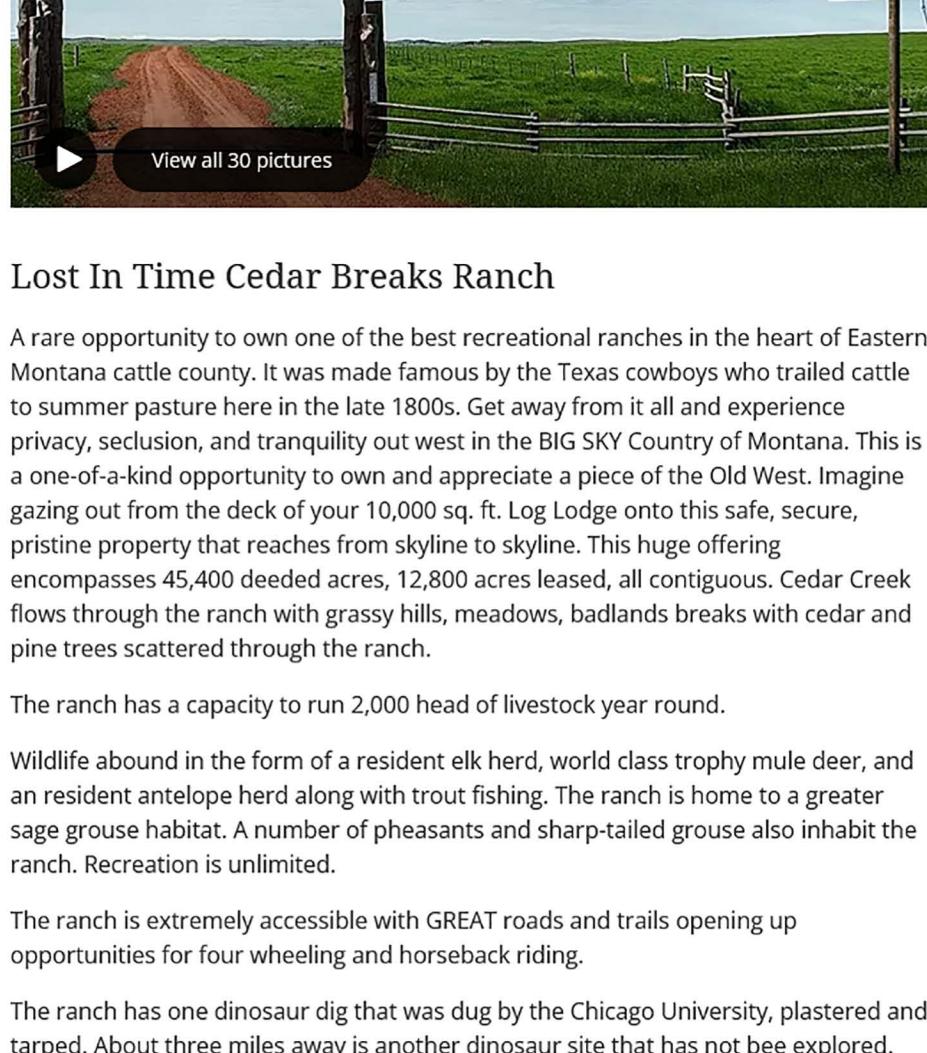
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EXHIBIT 4

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 Available**\$40,000,000**Pine Unit Road, Wibaux, MT 59353
(Wibaux County)**Size:** 45,400 Acres**Type:** Farms and Ranches, Recreational Property, Hunting Property, House
Home: 14 Beds - 7 Baths - 10,000 Sq Ft[Contact](#)

Lost In Time Cedar Breaks Ranch

A rare opportunity to own one of the best recreational ranches in the heart of Eastern Montana cattle country. It was made famous by the Texas cowboys who trailed cattle to summer pasture here in the late 1800s. Get away from it all and experience privacy, seclusion, and tranquility out west in the BIG SKY Country of Montana. This is a one-of-a-kind opportunity to own and appreciate a piece of the Old West. Imagine gazing out from the deck of your 10,000 sq. ft. Log Lodge onto this safe, secure, pristine property that reaches from skyline to skyline. This huge offering encompasses 45,400 deeded acres, 12,800 acres leased, all contiguous. Cedar Creek flows through the ranch with grassy hills, meadows, badlands breaks with cedar and pine trees scattered through the ranch.

The ranch has a capacity to run 2,000 head of livestock year round.

Wildlife abound in the form of a resident elk herd, world class trophy mule deer, and an resident antelope herd along with trout fishing. The ranch is home to a greater sage grouse habitat. A number of pheasants and sharp-tailed grouse also inhabit the ranch. Recreation is unlimited.

The ranch is extremely accessible with GREAT roads and trails opening up opportunities for four wheeling and horseback riding.

The ranch has one dinosaur dig that was dug by the Chicago University, plastered and tarped. About three miles away is another dinosaur site that has not bee explored.

Live in luxury, enjoy recreational freedom, get Lost in Time on this one-of-a-kind treasure.

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Amenities

Land

Activities

- Horseback Riding
- Hunting
- Off-roading

Barn Information

- Barn(s)
- Loaf Shed(s)
- Shop Building

Easements

- Access

Fish

- Trout

Land Type

- Both
- Hunting

Lot Description

- Acreage
- Horses Permitted
- Pasture
- Tank/Pond

Miscellaneous

- Cattle Working Pen
- Fenced for Cattle
- Fenced for Horses
- Loading Chute
- Windmill

Present Use

- Agrisbusiness
- Agriculture
- Grazing
- Hunting/Fishing
- Residential Multi-Family

Proposed Use

- Agriculture
- Grazing
- Hunting/Fishing
- Residential Multi-Family

Road Frontage Desc

- County
- Gravel/Rock
- Private

Special Notes

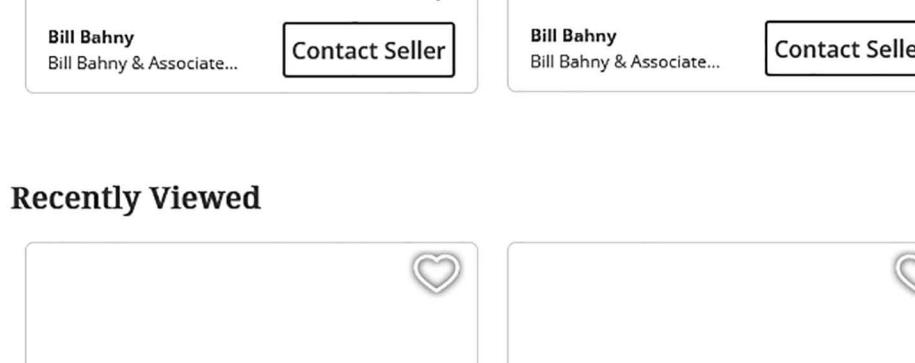
- Virtual Tour

Will Subdivide

- No

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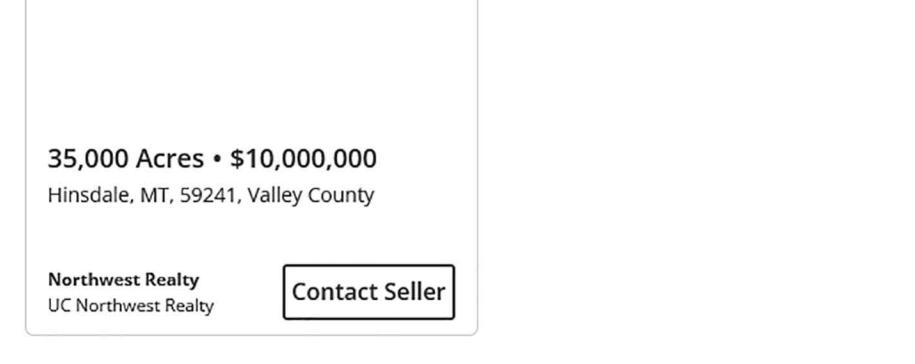
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2,160 Acres • \$3,900,000

3 beds • 3 baths

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381 Acres • \$4,750,000

Melstone, MT, 59054, Musselshell County

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94 Acres • \$1,795,000

East Helena, MT, 59635, Broadwater County

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35,000 Acres • \$10,000,000

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